

My name is Ian Evans, I have been involved in the industry for 27 yrs, I write this email as an enquiry about logbook fatigue rules and my question is.

Regarding proposed changes/ amendments to current laws relating to "fixing" the issues surrounding fatigue, has any proposal been offered to look at the way logbooks are interpreted?

For example if a driver is pulled over and his or her logbook is inspected, then what the officer is looking for is recorded work hrs, Not rest hrs. It's automatically assumed that 12 hrs work in 24 hrs with rest breaks will result in a maximum of 17 hrs overall with work/ rest time balanced out over that period "at maximum" in a work day!

Now this is fine for local operation, up to 100 km. However in a long haul or interstate application there is a distance factor as well over and above a similar daily activity " ie you must load unload the vehicle ,then drive to your next destination ".

Now by any means this is all work. The difference between the two work applications is that a local truck has no rest facilities on board and the rest facilities at most receival/despatch sites are more suited to pets than to people. More importantly the driver gets to go home at the end of the day for adequate rest, which is always in the back of his/ her mindset.

A vehicle used for long distance has rest quarters similar to a 5 star hotel ,where the operator can achieve adequate rest even if it's in a 15 min" powernap" capacity. In the type of work/ rest environment here there is not an " I must get finished to get home for tea " mentality. Psychologically an operator does not have the pressure of this type of restraint in their mind.

Add to this a vehicle designed for maximum driver comfort and in most if not all cases today a driver trip plan set down by the employer or by the ownerdriver ensures no need for over extending your task.

To change the method of assessment of a drivers daily fatigue levels from hrs worked to hrs of rest in an accrued format require no change to logbook and take the " got to get it done" in 12 hrs pressure off the table. Leaving the driver to concentrate on the task at hand including waiting to load/unload ,plan the first rest/ meal break and further along a major rest period.

In a long haul application consideration needs to be given to a number of factors . Circadian rhythm, access to suitable rest areas,driver health(mental and physical) vehicle breakdown. Environment (weather conditions) etc. In a real time example a driver would record activity times in a logbook and in the already provided column for comments a short note to explain the rest break. (sitting waiting for a load is different to a power nap) waiting to be served or eating a meal,again not sleeping.

All long distance(over 100km) where the driver is away from home is an "on the job" attitude. There is a difference here. A major rest break where the driver must stop can see as little as 5 hrs being completely adequate rest period for the driver. Most cases will see after a major rest break another rest break shortly for food or delivery/ pickup or queuing. By removing a mentality of " I must get it done in 12 hrs" ,to I must ensure I have / show adequate rest breaks in order not to get crippling fines will take huge stress related pressure off a driver.

Here is an example

I drive by mostly my circadian rhythm. Most of my driving is at night ,it's safer there's less traffic truck runs cooler uses less fuel etc. In a 12 hr work period I must fit in 1000 km ,easily done as my work has very efficient load /unload points.i often get to a major city and decide two things. Do I head in or do i wait for peak hr to finish. What will be most important to me is how I am feeling. Do I need an hr to sleep and rest up or do i feel good to go!

Here's the problem with work related accounting as opposed to rest related accounting of hrs. I must get it done in 12hr or I can't make money! (if I choose to rest before I drive in ,then I loose time and can't load out).this leads to me having significantly reduced returns at the end of the week. (All commercial interests think like this.) In a real time application that means I must drive tired so not to cost me money. Or my client for that matter. However I am completely legal and in a case where I may be pulled over ,I'm fine and legal. The officer has no idea I can't even change gears properly due to fatigue, because I won't look tired and am completely legal in my logbook. This goes the same for point to point monitoring of long haul operations. Drivers are forced to keep going to be legal if they (A) want to keep their job or (B) want to keep their truck or customer. This is not because they're being pushed by management. It's because the law says so.

(you rest, you loose bucko) .

By changing to an accounting of rest in a logbook as opposed to work an officer or compliance manager can see if the driver is rested and more importantly see a pattern of consideration for rest breaks and fatigue management strategies unfold in the logbook ,with small notes of why a rest break was applied and length of time.

In a nut shell a short look through a logbook under a rest accounting method would show the enquirer just how safe the driver was by looking for a pattern of rest as opposed to a rigid pattern of work. In any 24 hr rolling period a minimum of 8 hr required rest could be shown in the logbook no matter where it was started or finished.

Undertaken on an accrued method this type of accounting/ monitoring fatigue would remove a huge pressure on drivers and lead to safer operation of fatigue related vehicles. Not to mention greater productivity.

No one wants to drive tired or work ridiculous time frames just to earn a living!

Please submit this to the relevant department for consideration. I can be contacted by email or phone

Regards Ian Evans